

August 6, 2025

Non-Response To Motion To Compel

Hey, Judge Liman.

It's me again!

I - Mario Armando Lavandeira, Jr., known professionally as Perez Hilton - write as a nonparty in Lively v. Wayfarer Studios LLC (1:24-cv-10049).

I feel like we're starting to be pals with how much I'm writing to you! But, I know you're still *much* friendlier with Blake Lively's counsel.

This letter is NOT a response to the Motion To Compel just filed in your court by the disgraceful Esra Hudson.

This letter *is* a request for sanctions against Ms. Hudson, which your sexy and smart self has every right to impose on that clown - based on your inherent powers in this court.

It pains me that I can not respond to the Motion To Compel, but unless I am given the unredacted version of that AND all the exhibits unredacted as well - then I am afraid this letter as a non-response will have to suffice.

I only speak for myself. I have no knowledge if Mr. Baldoni or any of the Wayfarer defendants seek to move to keep sealing all the documents submitted by Ms. Lively's publicity-seeking lawyer, Esra Hudson.

Additionally, while I am not responding to the Motion To Compel, I want to remind everyone YET AGAIN that last week I already filed in Nevada district court a Motion To Quash this burdensome, unethical subpoena that is seeking my privileged and protected information as a journalist.

I am joyfully representing myself in subpoenae without an attorney, which I have every legal right to do, and though I haven't spent more than a minute or two preparing this letter, my research shows me that Ms. Hudson is misrepresenting the truth. Yet again. ANOTHER reason why you should sanction that disgraceful attorney and award *me* attorney's fees!

I have never consented to the SDNY having jurisdiction over the compliance of my subpoena.

My rudimentary findings are consistent with what I already know, what you know and what all of the VanZan scammer's legal team knows. That the appropriate venue to quash or compel this subpoena is Las Vegas. That is where I live, where I work, where I was served and that is listed in Ms. Lively's own subpoena as the place of compliance.

I look forward to litigating this and winning in Nevada.

The world is watching this case and your docket, Judge Liman.

Indignantly,

/s/ Mario Armando Lavandeira, Jr.

Mario Armando Lavandeira, Jr.

aka Perez Hilton